SOUTHERN	ATES DISTRICT COURT DISTRICT OF NEW YO	RK	
REYNA ARE	ROYO,		X
		Plaintiff,	DEFENDANT'S NOTICE OF MOTION TO DISMISS THE
	– against	_	AMENDED COMPLAINT
THE DEPAR NEW YORK	TMENT OF EDUCATIO	N OF THE CITY OF	Civil Action No. 19 Civ.7416 (ER)
		Defendant.	V
			g Declaration of Alana R. Mildner
and the exhib	pits annexed thereto, Mer	morandum of Law in S	upport of Defendant's Motion to
Dismiss the	Amended Complaint, an	d upon all the papers	and proceedings previously had
herein, Defen	dant, the Board of Educa	tion of the City School	District of the City of New York,
operating as t	he New York City Depa	rtment of Education, w	rill move this Court at the United
States Courth	ouse for the Southern D	istrict of New York, 40	Foley Square, New York, New
York 10007, 1	before the Honorable Edg	ardo Ramos, United Sta	ates District Judge, at such time as
the Court may	y deem fit to hear the par	ties, for a judgment, pu	rsuant to Federal Civil Procedure
Rule 12(b)(6)	, dismissing the Amende	ed Complaint against D	Defendant and granting Defendant
such other and	d further relief that this Co	ourt deems just and prop	er.
Date:	Queens, New York December 18, 2020		
		JAMES E. JOHNSO Corporation Counsel Attorney for Defenda	of the City of New York
		100 Church Street, Ro	oom 2-146
		New York, New York (212) 356-1177	3 10007
		By:	s/
		Alana R. Mild	ner

Assistant Corporation Counsel

Via ECF Stewart Lee Karlin Natalia Kapitonova Stewart Lee Karlin Law Group, P.C. Attorneys for Plaintiff 111 John Street #22 New York, NY 10007

Civil Action No. 19 Civ. 7416 (ER)			
UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK			
REYNA ARROYO,			
Plaintiff,			
-against-			
THE CITY OF NEW YORK DEPARTMENT OF EDUCATION,			
Defendant.			
NOTICE OF MOTION TO DISMISS THE AMENDED COMPLAINT			
JAMES E. JOHNSON Corporation Counsel of the City of New York			
Attorney for Defendant			
100 Church Street, Room 2-146 New York, New York 10007			
Of Counsel: Alana R. Mildner William S. J. Fraenkel			
Tel: (212) 356-1177 Matter No. 2019-062549			
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